

Before The
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Request for Relief from Phase II)	CC Docket No. 94-102
E911 Requirements)	

REQUEST FOR LATE ACCEPTANCE OF PETITION FOR RELIEF

Quick Call Cellular, LLC (“Quick Call”), by its attorneys, hereby respectfully requests late acceptance of the attached Petition For Relief from Phase II E911 requirements [“Petition”]. On November 20, 2000, Quick Call electronically filed a report regarding E911 requirements [“Report”]. Its records show that, on November 30, 2001, the Petition was prepared and ready for electronic filing, and that an electronic filing bearing the title “Petition” in fact was made on that date. The Petition indicates that a copy of it was e-mailed to Commission staff. However, it appears that, through an administrative error, the Report was attached to the November 30, 2001 filing instead of the Petition. Given that the Petition existed but inadvertently was not attached to the November 30, 2001 electronic filing, it is respectfully requested that the re-submission of the Report (attached hereto in its original form) be accepted, and that Quick Call be included on the Commission’s list of small carriers that have been afforded relief from E911 requirements.

Respectfully submitted,

By: /s/
Richard S. Myers

December 20, 2002

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PETITION FOR RELIEF

1. Quick Call Cellular, LLC ("Quick Call") is a small wireless cellular radiotelephone licensee providing service to customers in a very rural section of South Dakota. Quick Call's cellular system employs analog equipment. It relies on its equipment vendor, Integrated Wireless Systems, to advise Quick Call regarding updates and modifications to its hardware and software and to make available all necessary upgrades thereto. For the reasons stated herein, Quick Call respectfully requests relief from the E911 Phase II implementation rules contained in Section 20.18(e), (f) and (h) of the FCC's rules.

2. In its report describing its Phase II plans, Quick Call outlined its plan to deploy a network-based E911 solution. A network solution was selected, rather than a handset one, based on expected costs and availability. Quick Call is now advised by Integrated Wireless Systems that it does not intend to provide a solution to permit Quick Call to provide E911 service to its customers. After evaluation of possibilities, Quick Call has determined that the most feasible plan is to implement Phase II E911 Automatic Location Identification equipment and software at the time that it replaces its existing analog equipment with digital equipment. Quick Call also intends to explore the feasibility of deploying in its market other E911 solutions such as those offered by Telecommunications Systems.

3. After evaluating the situation based upon the time required to raise the necessary capital and order the equipment, Quick Call estimates that it will be able to meet the Phase II E911 Automatic Location Identification requirements of Section 20.18 by the third or fourth quarter of 2003. In this regard, it should be noted that, as of the date of this Petition, Quick Call has not yet received a request for either Phase I or Phase II E911 service from any public safety answering point in its market.

4. For the reasons described above, Quick Call respectfully requests a 24 month waiver of the E911 Phase II implementation rules contained in Section 20.18(e), (f) and (h). To help the FCC monitor Quick Call's progress in coming to compliance with these rules, PetroCom proposes submitting a progress report to the FCC every six months.

Respectfully submitted,

Quick Call Cellular, LLC

By: _____/s/

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November 30, 2001